MARK T. TILLAR (0029898) JOHN J. HELBLING (0046727) The Helbling Law Firm, L.L.C. 3672 Springdale Road Cincinnati, Ohio 45251 513-923-9740

## UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF OHIO WESTERN DIVISION

STEVE LEDFORD,	
PLAINTIFFS,	CASE NO.: C-1-01-469
VS.	JUDGE DLOTT
CITY OF CINCINNATI, ET AL.,	
DEFENDANTS.	

PLAINTIFFS' MOTION FOR ENLARGEMENT OF TIME FOR
PLAINTIFF TO RESPOND TO MOTION FOR SUMMARY JUDGMENT

On September 10, 2003, Defendants filed a Rule 56 Motion For Summary

Judgment for Defendants. Prior to filing said Motion, Plaintiffs and Defendants

discussed the need for additional depositions by Plaintiff of Defendants.

Defendants counsel previously agreed to depositions and they were scheduled for

October 1, 2003. The deponent was called out of town and unable to complete the

deposition scheduled. Defendant's Counsel notified Plaintiffs' counsel that the

deposition would need to be rescheduled for later in October. Plaintiff's agreed to Defendant's request. Plaintiff hereby moves this Court for an extension of time until October 29, 2003, to file Plaintiffs response to the pending Motion For Summary Judgment.

Respectfully submitted,

/s/ John J. Helbling /s/ Mark T. Tillar John J. Helbling 0046727 Mark T. Tillar 0029898 Trial Attorneys For Plaintiffs 3672 Springdale Road Cincinnati, Ohio 45251 Telephone: (513) 923-9740 Fax:(513) 923-9741

## CERTIFICATE OF SERVICE

I hereby certify that I served upon the opposing counsel enumerated below Plaintiffs' Motion for Enlargement of Time this 10th day of October 2003.

> /s/ John J. Helbling JOHN J. HELBLING (0046727)

Thomas J. Harris III 0065946 Defense Counsel for the City of Cincinnati **Assistant City Solicitor** Office of the Cincinnati City Solicitor 801 Plum Street - City Hall Room 214 Cincinnati, Ohio 45202 (513) 352-3321